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XEROX CORPORATION.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY,

Plaintiff,

v.

XEROX CORPORATION, and DOES
1-10, inclusive.

Defendants.

CASE NO.

(Santa Clara County Superior Court
Case No. 25CV465457)

**DECLARATION OF ANDREW G.
PROUT IN SUPPORT OF
PETITION AND NOTICE OF
REMOVAL OF CIVIL ACTION
PURSUANT TO 28 U.S.C. §§ 1332
AND 1441**

[Filed concurrently with the Notice of
Removal and Declaration of Jeffrey J.
Harradine]

Date State Action Filed: May 8, 2025

I, ANDREW G. PROUT, declare as follows:

1. I am an attorney at law duly licensed to practice in all of the courts of the State of California, and the United States District Court for the Northern District of California. I am a partner at the firm of Ross, Wolcott, Teinert & Prout LLP, attorneys of record for Defendant Xerox Corporation (“Xerox” or “Defendant”) in the above-captioned case. The facts set forth herein are true of my own personal knowledge and if sworn, I could and would testify competently thereto.

DECLARATION OF ANDREW G. PROUT

2. On or about May 8, 2025, Plaintiff The Board of Trustees of the Leland Stanford Junior University (“Plaintiff”) filed an action against Xerox entitled *The Board of Trustees of The Leland Stanford Junior University vs. Xerox Corporation* in the Superior Court of California for the County of Santa Clara, commencing Case Number 25CV465457 (the “Complaint”). A true and correct copy of the Summons, Civil Case Cover Sheet, and Complaint is attached hereto as Exhibit A.

3. Plaintiff’s Complaint alleges claims against Xerox for (1) Breach of Lease; (2) Waste; (3) Continuing Nuisance; and (4) Continuing Trespass.

4. On May 14, 2025, Plaintiff served Xerox with a Summons and the Complaint. Xerox’s notice of removal, filed on June 13, 2025, is filed within thirty (30) days after service of the Summons and Complaint, and is therefore timely under 28 U.S.C. § 1446(b).

5. Xerox will serve written notice of the filing of this Notice of Removal to Plaintiff as required by 28 U.S.C. §1446(d) and will file a Notice of Removal with the clerk of the Superior Court of the State of California in and for the County of Santa Clara, as further required by statute and case law.

6. Xerox will give prompt notice of the filing of this Notice of Removal to Plaintiff and to the Clerk of the Superior Court of the State of California for the County of Santa Clara.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 13, 2025, at Costa Mesa, California.

/s/ Andrew G. Prout

Andrew G. Prout